

**BELDOCK LEVINE & HOFFMAN LLP**  
**99 PARK AVENUE, PH/26<sup>TH</sup> FLOOR**  
**NEW YORK, N.Y. 10016**

CYNTHIA ROLLINGS  
JONATHAN MOORE  
JONATHAN K. POLLACK  
HENRY A. DLUGACZ  
STEPHEN J. BLUMERT  
MARC A. CANNAN  
DAVID B. RANKIN  
LUNA DROUBI  
MYRON BELDOCK (1929-2016)  
LAWRENCE S. LEVINE (1934-2004)  
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400  
FAX: (212) 277-5880  
WEBSITE: blhny.com

COUNSEL  
BRUCE E. TRAUNER  
PETER S. MATORIN  
KAREN L. DIPPOLD  
JEFFREY A. GREENBERG  
MARJORIE D. FIELDS  
EMILY JANE GOODMAN  
(JUSTICE, NYS SUPREME COURT, RET.)  
FRANK HANDELMAN

REF: 8246.01

WRITER'S DIRECT DIAL:  
(212) 277-5875  
[ldroubi@blhny.com](mailto:ldroubi@blhny.com)

December 16, 2020

**VIA ECF**

Honorable Andrew L. Carter  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: *Piligan v. Icahn School of Medicine at Mount Sinai*, 17-CV-1975 (ALC) (SDA)

Dear Judge Carter:

We represent plaintiff George Piligian, M.D. We write with Defendant's consent to seek an extension of time to file the Joint Pre-Trial Order until February 26, 2021. This is the Parties' second request for an extension.

The reason for the request is that Plaintiff has been diligently working on updating his expert report regarding his economic damages to accurately calculate Plaintiff's damages for trial. However, this process has taken longer than anticipated due to his work schedule and a death in his family. We aim to produce Defendant with the report by or about January 4, 2021. Defendant will then update its rebuttal report.

The additional time will also allow the Parties to continue to pursue settlement and, if needed, request a settlement conference before Magistrate Judge Aaron.

We thank the Court for its time and consideration.

Respectfully submitted,

Luna Droubi

cc: All Parties (via ECF)

SO ORDERED:  
  
ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

December 17, 2020